

# McKool Smith

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March 24, 2025

By ECF

The Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 2270  
New York, New York 10007

Re: Stein and Lhote v. Skatteforvaltningen  
23 Civ. 2508 (NRB)

Dear Judge Buchwald:

We write in advance of the trial scheduled to begin on Tuesday, April 29, 2025. We write jointly on behalf of all parties except as to the one matter specifically noted below.

**Trial Scheduling.** The parties presently expect the trial to occur as follows:

**Tuesday, April 29:** Plaintiffs-Counterclaim Defendants Matthew Stein and Jerome Lhote; Counterclaim Defendant Luke McGee (to continue to Wednesday, April 30, if necessary)

**Wednesday, April 30:** Gry Ahlefeld Engel; Steen Bechmann Jacobsen

**Thursday, May 1:** Per Justesen (remotely; SKAT's Danish law expert); Lasse Lund Madsen (Danish law expert on behalf of Stein, Lhote, and McGee); Marshall Miller, and Marc Landy

The parties reserve their rights with respect to the calling of witnesses, the order, and objections to their testimony.

**Opening Statements/Closing Arguments.** Unless the Court directs otherwise, the parties do not intend to make opening statements or closing arguments.

**Schedule for Pre-Trial Submissions.** The Court had previously ordered that the parties file their pre-trial submissions on or before Tuesday, April 1.

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Stein, Lhote, and McGee respectfully request that the Court extend the deadline for these submissions to Monday, April 7.

The reason for the request for a brief adjournment is to permit Stein, Lhote, and McGee additional time to consult with their Danish counsel regarding matters expected to be raised in their pre-trial submissions. In addition, they submit that the additional time will permit them to prepare submissions that will assist the Court more effectively.

Based on my communications with counsel for SKAT, I can represent that SKAT takes no position on the requested extension.

\* \* \*

Counsel for the parties are available for a conference at the Court's convenience, if necessary.

Respectfully submitted,

/s/

Daniel W. Levy

cc: All Counsel (by ECF)

The parties shall file witness statements with exhibits and proposed findings of fact and conclusions of law on or before Monday, April 7, 2025.

SO ORDERED.

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NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Date: March \_\_\_\_, 2025  
New York, New York